

Hearing Date and Time: July 23, 2020, at 2:00 p.m. (prevailing Eastern Time)
Objection Date and Time: July 16, 2020, at 4:00 p.m. (prevailing Eastern Time)

TARTER KRINSKY & DROGIN

Counsel for Plaintiffs
1350 Broadway, 11th Floor
New York, NY 10018
Tel: (212) 216-8000
Scott S. Markowitz, Esq.
Rocco A. Cavalieri, Esq.
Michael Z. Brownstein, Esq.

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re	Chapter 11
PURDUE PHARMA, L.P., <i>et al.</i> ,	Case Nos.19-23649 (RDD)
Debtors. ¹	(Jointly Administered)

NOTICE OF MOTION BY NAS GUARDIANS ON BEHALF OF THE NAS CHILDREN'S ABATEMENT CLASS ACTION CLAIMANTS FOR ENTRY OF AN ORDER PURSUANT TO FED. R. BANKR. P. 9014 AND 7023 PERMITTING THEM TO FILE A CLASS PROOF OF CLAIM AND GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that on July 9, 2020, Jacqueline Ramirez, Melissa Barnwell and Ashley Dawn Marie Poe, who are Legal Guardians of neonatal abstinence syndrome (“NAS”) Children R.R., C.G., and P.P.R.P. (“Plaintiffs”), filed a motion (the “Motion”), in their individual

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Adlon Therapeutics L.P. (6745), Greenfield Bio Ventures L.P. (6150), Imbrium Therapeutics L.P. (8810) Seven Seas Hill Corp. (4591), Ophir Green Corp (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' mailing address is One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901. For ease of reference, the term “Purdue” as used herein, refers to Debtors. For the purposes of this Motion, all allegations set forth herein related to or pertaining to “Manufacturers” apply equally to Purdue.

capacities as legal guardians for their NAS Children and on behalf of all other similarly situated legal guardians for their NAS Children, pursuant to Fed. R. Bankr. P. 9014 and 7023 for the entry of an order making Fed. R. Civ. P. 23 applicable to the “NAS Legal Guardians Class Proof of Claim” (hereinafter “Class Proof of Claim”), permitting them to file the Class Proof of Claim and granting related relief. A hearing on the Motion will be held on **July 23, 2020 at 2:00 p.m.** (prevailing Eastern Time) (the “Hearing”) before the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, White Plains Division (the “Bankruptcy Court”), or at such other time as the Bankruptcy Court may determine.

PLEASE TAKE FURTHER NOTICE that pursuant to General Order M-543, dated March 20, 2020 (Morris, C.J.) (“General Order M-543”), the Hearing will be conducted telephonically.² Parties wishing to appear at, or attend, the Hearing must refer to and comply with the Bankruptcy Court’s guidelines for telephonic appearances³ and make arrangements with Court Solutions LLC by telephone at (917) 746-7476.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or a later hearing.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court

² A copy of General Order M-543 can be obtained by visiting <http://www.nysb.uscourts.gov/news/court-operationsunder-exigent-circumstances-created-covid-19>.

³ The Bankruptcy Court’s procedures for telephonic appearances are available at: <http://www.nysb.uscourts.gov/telephonic-appearances-white-plains>.

(a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted pro hac vice, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with the Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures entered on November 18, 2019 [ECF No. 498], so as to be filed and received no later than **July 16, 2020 at 4:00 p.m.** (prevailing Eastern Time) (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served, the Plaintiffs may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that copies of the Motion may be obtained free of charge by visiting the website of Prime Clerk LLC at <https://restructuring.primeclerk.com/purduepharma>. You may also obtain copies of any pleadings by visiting the Bankruptcy Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: July 9, 2020
New York, New York

Respectfully submitted,

/s/Scott S. Markowitz
TARTER KRINSKY & DROGIN LLP
Scott S. Markowitz
1350 Broadway, 11th Floor
New York, NY 10018
Telephone: 212-216-8000
Facsimile: 212-216-8001
Email: smarkowitz@tarterkrinsky.com

MARTZELL, BICKFORD & CENTOLA
Scott R. Bickford (LA 1165)
Spencer R. Doody (LA 27795)
338 Lafayette Street
New Orleans, LA 70130
Telephone: 504-581-9065
Facsimile: 504-581-7635
sbickford@mbfirm.com
srd@mbfirm.com
usdcndoh@mbfirm.com

THE CREADORE LAW FIRM, P.C.
Donald Creadore (DEC-8984)
450 Seventh Avenue - 1408
New York, NY 10123
Telephone: 212-355-7200
Facsimile: 212-583-0412
Primary: [dонаld@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)
Secondary: donald@aol.com

Attorneys for Plaintiffs